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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 11, 2013

TO: Internal File

THRU: Steve Christensen, Lead S/KC

FROM: James Owen, Engineer JO

RE: Abandoned Equipment, Canyon Fuel Company, Dugout Canyon Mine,
C/007/0039, Task #4241

SUMMARY:

On January 4, 2013 the Utah Division of Oil Gas & Mining received an application for an amendment to the Mining & Reclamation Plan (MRP) of the Dugout Canyon mine. The application seeks approval to abandon mining equipment in an area that is being sealed.

This memo addresses the application's compliance with the engineering (R645-301-500) section of the Utah Coal Mining Rules. Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

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TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

Chapter 5, pages 5-x and 5-72 of the current approved MRP were previously updated to include the abandonment of equipment. The text references metallurgical studies cited by the BLM, and provides a discussion outlining the insignificance of abandoning steel underground. For this amendment, Figures 1 and 2 were replaced and Figure 3 was added to Appendix 5-3.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Abandoning equipment is allowed by Utah Rules if it is done in accordance with R-645-301.542.741. The proposed abandonment will be in an area that will not affect stability of reclamation activities or cause issues with revegetation as it will not be near the surface.

Due to the fact that the equipment to be abandoned has been removed of all fluids, electronics, batteries, etc., there appear to be no potential contamination issues.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

In Appendix 5-3, Figures 1 (Gilson Seam Mine Map – Abandoned Mining Equipment Locations) and 2 (Environmental and CERCLA Certification Gilson South East Sealed District Equipment Remaining Underground) have been updated to include the equipment currently proposed for abandonment. Figure 3 was added.

The above noted figures have been properly certified.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

Approval is recommended.

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